

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

KOCH FOODS OF ALABAMA, LLC,)	
an Alabama limited liability company,)	
)	
Plaintiff and Counter-)	
Defendant,)	
)	CIVIL ACTION NO.
vs.)	2:07 CV 522-MHT
)	
GENERAL ELECTRIC CAPITAL)	
CORPORATION, a Delaware corporation,)	
)	
Defendant, and Counter-)	
Plaintiff,)	
)	

GE CAPITAL'S SUBMISSION OF
PROPOSED VOIR DIRE QUESTIONS

Defendant and Counterplaintiff, General Electric Capital Corporation, through its undersigned attorneys, in conjunction with the Uniform Scheduling Order entered in the above-captioned proceeding on July 17, 2007 (Doc. No. 14), submits the following as its proposed voir dire questions to be asked to potential jurors:

1. Each of those questions set forth in the Juror Questionnaire as contained on the Court's website.
2. Do you know any of the attorneys representing Koch Foods or GE?
3. Have you or anyone in your family ever worked at Koch Foods or GE?
4. Do you know anyone that works or has worked at Koch Foods or GE?
5. Have you ever had a GE appliance or other product with which you were dissatisfied?
6. Do you believe that a written contract between two businesses is the best evidence of what they intended to agree upon?

7. Do you believe that a person who claims to own a valuable piece of equipment should have to pay for it?
8. Do you believe that a piece of machinery that is running just fine could be more valuable than a similar piece of machinery that you could buy at auction and then install?
9. If you buy a house, do you believe that the washer and dryer come with it automatically?
10. Would you be willing to award punitive damages against a large corporation if those damages were paid to another large corporation?

Dated: March 31, 2008.

By: /s/ Rusha C. Smith
Attorney for General Electric Capital
Corporation

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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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